

**Summary of Remarks Prepared for Delivery by Ann E. Goode**  
**Director, EPA Office of Civil Rights**  
**Subcommittee on Oversight and Investigations**  
**Committee on Commerce, U.S. House of Representatives**  
**August 6, 1998**

The U.S. Environmental Protection Agency (EPA) is firmly committed to fulfilling its legal responsibilities under Title VI of the Civil Rights Act of 1964. Since 1993, EPA's Office of Civil Rights (OCR) has received 58 administrative complaints filed under Title VI, which allege discrimination on the basis of race, color, and national origin by recipients of EPA funding. In February 1998, OCR issued the *Interim Guidance for Investigating Title VI Administrative Complaints Challenging Permits*, to provide a common sense approach for processing the growing backlog of Title VI complaints while concurrently soliciting public comment.

The Interim Guidance has provided a starting point to open up dialogue with community leaders, state and local officials, business interests, and others. A meaningful dialogue is a primary purpose of EPA's Title VI Implementation Advisory Committee, which will provide recommendations on how state environmental agencies can address Title VI concerns up-front in the permitting process. EPA also has asked its Science Advisory Board to conduct an objective, scientific peer review of proposed methodologies to assess disparate impact.

Additionally, EPA has established the State and Tribal Environmental Justice Grants Program to provide assistance to state and tribal governments as they develop programs to address Title VI concerns. EPA has set aside a total of \$500,000, with a maximum of \$100,000 per grant, and expects to award the grants in the near future. In response to concerns raised by local government officials, Administrator Browner has committed to the establishment of a mayors' desk in EPA's intergovernmental office and the development of a "one-stop shopping" information resource center to provide one source of information regarding financial assistance and other resources available to mayors. EPA also will work with the U.S. Conference of Mayors to consider options for establishing a mayors/cities advisory committee. These commitments are designed to provide support to local governments and to continue a dialogue with the mayors on important policy issues, including Title VI.

In discussions with stakeholders, EPA has heard concerns that our developing Title VI program will deter economic redevelopment, particularly the much-needed revitalization of and reinvestment in urban centers across the nation. However, we know that involving communities up front and every step of the way -- as we do in our Brownfields program -- works.

EPA's Brownfields program has given many urban centers new hope and promise while protecting the environment, public health, and basic rights of citizens. These approaches enable communities to have the input to which they are entitled while providing state and local decisionmakers and businesses the certainty they deserve. Although none of the 58 Title VI complaints filed with EPA involves a Brownfields project or has held up redevelopment in our cities, EPA is mindful of the concerns raised. For example, EPA has committed to conducting several case studies at Brownfields sites to look at issues related to Title VI and Brownfields redevelopment.

Ensuring the basic rights of every citizen is not about stopping development, but about responsible development. EPA remains firmly convinced that economic growth can continue while protecting the rights of all citizens to a safe and healthy environment.

In conclusion, EPA's Title VI program involves an emerging area of environmental and civil rights law and policy and we, at EPA, don't have all the answers. Therefore, dialogues such as this are critical to our success, and EPA is firmly committed to continuing these discussions with affected stakeholders and other interested parties to ensure that we develop a final Title VI policy that works for everyone. We welcome any recommendations that this Subcommittee may have to assist EPA's efforts to ensure environmental and public health protections while also protecting the basic rights of all citizens. Thank you.